

Grove



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BOX 555008

CAMP PENDLETON CALIFORNIA 92055-5008

2010 MAR 29 A 10:13

SAN DIEGO REGIONAL  
WATER QUALITY  
CONTROL BOARD

IN REPLY REFER TO:

5090.11

ENVSEC/41

March 26, 2010

Amy Grove  
San Diego Regional Water Quality Control Board  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123-4353

SUBJECT: COMMENTS - LAS PULGAS LANDFILL: TENTATIVE WASTE DISCHARGE  
REQUIREMENTS ORDER NO. R9-2010-0004 AND MONITORING AND  
REPORTING PROGRAM NO. R9-2010-0004

Dear Ms. Grove:

Enclosed please find our comments on the tentative Waste Discharge Requirements and Monitoring and Reporting Program No. R9-2010-0004. In general our comments request only minor clarifications along with additional time to comply with some of the new monitoring and reporting requirements of the permit. We appreciate the opportunity to comment on this and work together on revising the waste discharge requirements for the Las Pulgas Landfill.

If you have any questions or concerns, please contact Mr. Brian Shin at 760-763-7747.

Sincerely,

A. C. ENTINGH  
Head, Environmental Compliance Dept  
Assistant Chief of Staff,  
Environmental Security  
By direction of the Commanding Officer

Enclosure: Camp Pendleton's comments on Tentative WDR Order No. R9-2010-0004

Comments on Tentative WDR  
Order No. R9-2010-0004  
Las Pulgas Landfill

Specific Comments:

**Information Sheet**

1. Information Sheet, Pg 5, Item 4, 1<sup>st</sup> Paragraph: The landfill gas monitoring wells have been installed between September 8<sup>th</sup> and October 1<sup>st</sup> of 2009. During Phase II construction, two wells (LFG-03 and LFG-10) will be destroyed in a manner appropriate to local regulatory requirements and additional wells will be installed to meet the requirements of CCR Title 27, Sections 20917 through 20939.
2. Information Sheet, Attachment 1: Summary of Strength Parameters for Bulk Materials, Protective Cover Layer, Shear Strength Parameters should be:  
  
 $\Phi = 32^\circ/c = 200$  psf (for construction of base liner only)  
 $\Phi = 29^\circ/c = 125$  psf (for operations placement on side slope).
3. Information Sheet, Attachment 1: Summary of Strength Parameters for Slope Liner Interface Components, 16-oz Geotextile & smooth 60-mil HDPE, Residual Shear Strength Parameter should be  $\Phi = 8^\circ$ . For the Peak Shear Strength Parameter, a note should be added to state that a thickened toe to maintain interim stability will be required during operations for incremental placement of the protective cover soil.

**Tentative Order R9-2010-0004**

4. Tentative Order R9-2010-0004, 1<sup>st</sup> Page, Paragraph titled "DISCHARGER": Las Pulgas began landfill operations on March 1971.
5. Tentative Order R9-2010-0004, Page 4, Finding 11.c.: Protective cover soil layer will be placed incrementally 8 to 10 feet up the entire lined sideslope. The current wording makes it sound that PCS will not be placed above the initial 8 to 10 feet. Additionally, delete the words "consisting of loamy or sandy clays with a permeability ranging between  $1 \times 10^{-3}$  to  $1 \times 10^{-4}$  cm/sec" and replace with "with a permeability at least  $2 \times 10^{-3}$  cm/sec or greater". This permeability was used in the design considerations.
6. Tentative Order R9-2010-0004, Page 4, Finding 12: Protective cover soil layer will be placed incrementally 8 to 10 feet up the entire lined side slope. Additional soils will be placed at the toe of slope along with the 8 to 10 feet of the protective cover soil. The permeability of the protective cover soil is  $2 \times 10^{-3}$  cm/sec or greater.

7. Tentative Order R9-2010-0004, Page 4, Finding 15: Tentative Order No. 2009-0009-DWQ is the WDR for discharges for storm water associated with construction activities, not industrial activities. The construction of the Phase II liner will be covered under this permit, and the operation of the landfill is currently covered under Order No 97-03-DWQ.
8. Tentative Order R9-2010-0004, Page 9, Order B.3.: Request including authorization to discharge wastes within the legacy unlined limits of the landfill.
9. Tentative Order R9-2010-0004, Page 9, Order C.2.: The solids to liquid ratio should be 5:1 by weight as stipulated in 27 CCR 20220(c)(3).
10. Tentative Order R9-2010-0004, Page 15, Order D.8.b.: The landfill is equipped with a double walled aboveground storage tank. No sump is proposed.
11. Tentative Order R9-2010-0004, Page 15, Order D. Landfill Operation Specifications: Request adding the following item:

**“ 9. PROTECTIVE COVER SOIL PLACEMENT.** Incremental placement of the 2 feet thick protective cover soil layer during operations shall not be compacted against the side slope liner. Rather, the 2 feet thick protective cover soil placement during operations must be placed with additional soil to construct a thickened toe to maintain interim stability. Equipment loads shall not be allowed on the landfill side slope during protective cover soil placement.”
12. Tentative Order R9-2010-0004, Page 18, Order E.6.d.i: Change “concsituents” to “constituents”.
13. Tentative Order R9-2010-0004, Page 29, Order H.6.a.: Request changing the term “Final Design Report” to “Final Engineering Report” to distinguish from the “Final Design Report” that is part of the Joint Technical Document for Las Pulgas Landfill.
14. Tentative Order R9-2010-0004, Page 20, Order E.7.d.: Request to include Technical Demonstration (as defined in this paragraph) to be included in the Final Engineering Report (as required in Tentative Order R9-2010-0004, Page 29, Order H.6.a.) and not the CQA Report. The Technical Demonstration shall use actual data as used for construction.
15. Tentative Order R9-2010-0004, Page 21, Order E.9.: Request to change the title “Operations Layer” to Protective Cover Soil for clarification.
16. Tentative Order R9-2010-0004, Page 21, Order E.9.ii.: Request to revise the requirement to state “Be comprised of soil materials having a minimum laboratory permeability of  $2 \times 10^{-3}$  cm/sec”.

17. Tentative Order R9-2010-0004, Page 21, Order E.10.b.ii.: "Processed green wastes" should be changed to "processed green material"
18. Tentative Order R9-2010-0004, Page 22, Order F.3.: Should be rewritten to state "all portions of the final cover shall have a slope of at least three percent and the cover shall be maintained to prevent ponding and infiltration." Currently reads as if any slope cannot deviate from 3 percent.
19. Tentative Order R9-2010-0004, Page 29, Order H.6.a.: Request to include Technical Demonstration (as defined in Tentative Order R9-2010-0004, Page 20, Order E.7.d) in the Final Engineering Report vice CQA Report. Technical demonstration that the proposed sideslope liner design can be constructed and remain stable and functional can be achieved by using actual data as used for construction meets specified criteria.

#### **Tentative Monitoring and Reporting Program No. R9-2010-0004**

20. Tentative Monitoring and Reporting Program No. R9-2010-0004 Finding No. 5.b.: Request clarification that the Slope Stability Workplan and Monitoring Report is only for the 2:1 slope of the Phase II liner construction area.
21. Tentative Monitoring and Reporting Program, Page 6, Part I.B.1.: MCB Camp Request extending from 90 days to 365 days the requirement for submitting a sampling and analysis work plan to allow time to amend an existing monitoring contract for the inclusion of developing a Sampling and Analysis Contract.
22. Tentative Monitoring and Reporting Program No. R9-2010-0004 Part I, B.2.: Request an extending from 90 days to 365 days the requirement for submitting the work plan for slope stability monitoring. Additional time is necessary to obtain funding and establishing a contract for this requirement. In addition, CH2M Hill, as part of their CQA scope will be mapping the geology of the cut slope during Phase II liner construction. This geologic mapping data will take longer than 90 days to compile and analysis and the information would support the workplan for the locations and amounts of inclinometer and/or permanent survey monument .
23. Tentative Monitoring and Reporting Program, Page 13, Part II.E.1.: Change "9W-04A" to "8W-04A" and list only once.
24. Tentative Monitoring and Reporting Program, Page 15, Part II.F.1.: Request correction to the description of the surface water monitoring point. The outfall of the desiltation basin is to an un-named tributary to Las Flores Creek which runs up Las Pulgas Canyon.
25. Tentative Monitoring and Reporting Program, Page 25, Part IV.B.6.a.i.: MCB Camp Pendleton does not have a statistician or mathematician on staff and requests an extension from 30 days to 365 days for this requirement.

26. Tentative Monitoring and Reporting Program, Page 29, Part V.B.1.b.: Request allowing for 365 days to submit a revised Report of Waste Discharge proposing an Evaluation Monitoring Program meeting the requirements of CCR Title 27, sections 20420(k)(5) and 20425, and satisfies the requirements of 40 CFR, Part 258.55.
  
27. Tentative Monitoring and Reporting Program, Page 32, Part V.C.4.c.: A minimum of 365 days will be needed to conduct NEPA, request funding, and contracting out for a new well installation.